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October 20, 2022

VIA PACER

Hon. Dora L. Irizarry
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Xiamen ITG Group Corp. v. Peace Bird Trading Corp.*
19-cv-6524-DLI-ST

Dear Judge Irizarry:

The Firm requests leave to withdraw as counsel for defendants and counterclaimants Peace Bird Trading Corp., Xing Lin (USA) International Corp. and Crystal Vogue, Inc. (collectively the “Clients”) and that the action be stayed for forty-five days to allow the Clients an opportunity to retain replacement counsel. Counsel for plaintiff and counter defendant Xiamen ITG Group Corp. consents to the withdrawal and to the forty-five day stay.

The request is made pursuant to Rule 1.16(c)(5) of the New York Rules of Professional Conduct because the Clients are unable to comply an agreement as to payment of expenses and fees. The Clients’ principal, Brian Wenyi Wu, has been informed of this application and expressed no opposition.

Respectfully,

/s/James G. McCarney

James G. McCarney

cc via Pacer: John J. Janiec, Esq.
cc via email: Brian Wenyi Wu